

UNITED STATES BANKRUPTCY  
COURT DISTRICT OF NEW JERSEY

**POST-DISMISSAL MONTHLY FEE STATEMENT COVER SHEET FOR THE  
PERIOD JULY 1, 2024 THROUGH JULY 31, 2024**

Debtor: LTL Management LLC Applicant: Genova Burns LLC  
Case No.: 23-12825(MBK) Client: Official Comm of Talc Claimant  
Chapter: 11 Case Filed: April 4, 2023

**SECTION 1  
FEE SUMMARY**

X Post-Dismissal Monthly Fee Statement No. 12 or ☐ Final Fee Application

Summary of Amounts Requested for the Period from July 1, 2024 through July 31, 2024  
(the "Twelfth Post-Dismissal Statement Period")

Total Fees: \$ 33,547.50\*  
Total Disbursements: \$ 0.00  
Minus 20% holdback of Fees on Appellate work: \$ 4,552.00\*  
Amount Sought at this Time: \$ 23,601.75  
80% of \$22,760.00 = \$18,208.00  
50% of non-appellate work \$10,787.50 = \$5,393.75

NAME OF PROFESSIONAL & TITLE	YEAR ADMITTED (Or Years Of Professional Service)	HOURS	RATE	FEE
1. Daniel M. Stolz, Partner	1980	24.30	900.00	21,870.00
2. Donald W. Clarke, Partner	2008	3.60	700.00	2,520.00
3. Susan S. Long, Counsel	2007	11.60	550.00	6,380.00
4. Lorrie Denson	Paralegal	10.10	275.00	2,777.50

Fee Totals: \$ 33,547.50  
Disbursements Totals: \$ 0.00  
Total Fee Application \$ 33,547.50

**\* In the attached statement attached as Exhibit "A", cumulative fees of \$22,760.00 were devoted to appellate work, and the balance in the amount of \$10,787.50 was devoted to necessary, non-appellate administrative tasks performed by Genova Burns. The fees for appellate work are being charged at 100% and shall be paid 80% on a monthly basis, pursuant to agreement with LTL, and the non-appellate work will be paid at the rate of 50%.**

**SECTION II SUMMARY  
OF SERVICES**

<b>SERVICES RENDERED</b>	<b>HOURS</b>	<b>FEE</b>
a) <b>Asset Analysis and Recovery:</b> Identification and review of potential assets including causes of action and non-litigation recoveries.		
b) <b>Asset Disposition</b> Sales, leases, abandonment and related transaction work.		
c) <b>Avoidance Action Litigation</b> Preference and fraudulent transfer litigation.		
d) <b>Business Operations</b> Issues related to debtor-in-possession operating in chapter 11 such as employee, vendor, tenant issues and other similar problems.		
e) <b>Case Administration</b> Coordination and compliance activities, including preparation of statement of financial affairs, schedules, list of contracts, United States Trustee interim statements and operating reports; contacts with the United States Trustee; general creditor inquiries.	28.50	24,555.00
f) <b>Claims Administration and Objections</b> Specific claim inquiries; bar date motions; analyses, objections and allowance of claims.		
g) <b>Employee Benefits/Pensions</b> Review issues such as severance, retention, 401K coverage and continuance of pension plan.		
h) <b>Fee/Employment Applications</b> Preparations of employment and fee applications for self or others; motions to Establish interim procedures.	9.80	2,777.50
i) <b>Fee/Employment Objections</b> Review of an objections to the employment and fee applications of others.		
j) <b>Financing</b> Matters under 361, 363 and 364 including cash collateral and secured claims; loan document analysis.		
k) <b>Litigation</b> Other than Avoidance Action Litigation (there should be a separate category established for each major matter).	11.30	6,215.00
l) <b>Meetings of Creditors</b> Preparing for and attending the conference of creditors, the 341(a) meeting and other creditors' committee meetings.		
m) <b>Plan and Disclosure Statement</b> Formulation, presentation and confirmation; compliance with the plan confirmation order, related orders and rules; disbursement and case closing activities, except those related to allowance and objections to allowance of claims.		

SERVICES RENDERED	HOURS	FEE
n) <b>Relief from Stay Proceedings</b> Matters relating to termination or continuation of automatic stay under 362.		
o) <b>Accounting/Auditing</b> Activities related to maintaining and auditing books of account, preparation of financial statements and account analysis.		
p) <b>Business Analysis</b> Preparation and review of company business plan; development and review of strategies; preparation and review of cash flow forecasts and feasibility studies.		
q) <b>Corporate Finance</b> Review financial aspects of potential mergers, acquisitions and disposition of company or subsidiaries.		
r) <b>Data Analysis</b> Management information systems review, installation and analysis, construction, maintenance and reporting of significant case financial data, lease rejection, claims, etc.		
s) <b>Litigation Consulting</b> Providing consulting and expert witness services related to various bankruptcy matters such as insolvency, feasibility, avoiding actions; forensic accounting, etc.		
t) <b>Reconstruction Accounting</b> Reconstructing books and records from past transactions and bringing accounting current.		
u) <b>Tax Issues</b> Analysis of tax issues and preparation of state and federal tax returns.		
v) <b>Valuation</b> Appraise or review appraisals of assets.		
w) <b>Travel Time</b>		
<b>SERVICE TOTALS:</b>	49.60	\$33,547.50

**SECTION III**  
**SUMMARY OF DISBURSEMENTS**

<b>DISBURSEMENTS</b>	<b>AMOUNT</b>
a) <b>Filing Fees</b> Payable to Clerk of Court.	
b) <b>Computer Assisted Legal Research</b> Westlaw, Lexis and a description of manner calculated.	
c) <b>Pacer Fees</b> Payable to the Pacer Service Center for search and/or print.	
d) <b>Fax</b> Include per page fee charged.	
e) <b>Case Specific Telephone/Conference Call Charges</b> Exclusive of overhead charges.	
f) <b>In-house Reproduction Services</b> Exclusive of overhead charges.	
g) <b>Outside Reproduction Services</b> Including scanning services.	
h) <b>Other Research</b> Title searches, UCC searches, Asset searches, Accurint.	
i) <b>Court Reporting</b> Transcripts.	
j) <b>Travel</b> Mileage, tolls, airfare, parking.	
k) <b>Courier &amp; Express Carriers</b> Overnight and personal delivery.	
l) <b>Postage</b>	
m) <b>Other (specify) Litigation Support Vendors</b>	
<b>DISBURSEMENTS TOTAL:</b>	<b>\$0.00</b>

I certify under penalty of perjury that the above is true.

Date: August 13, 2024

*/s/ Daniel M. Stolz*

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DANIEL M. STOLZ